Headquarters U.S. Air Force

Integrity - Service - Excellence

Air Quality Managers Roundtable

U.S. AIR FORCE

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HQ USAF/ILEVQ
21 Nov 02

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Overview

- Air Force Instruction (AFI)
  - Update/Strategy
- Environmental Quality (EQ)
  - Program Review
- Automated Civil Engineer System
  - Air Quality Program
- Military MACT
- MACT Hammer
  - Permit Applications
- Legislative Proposals
- Conclusions

AFI Update/strategy

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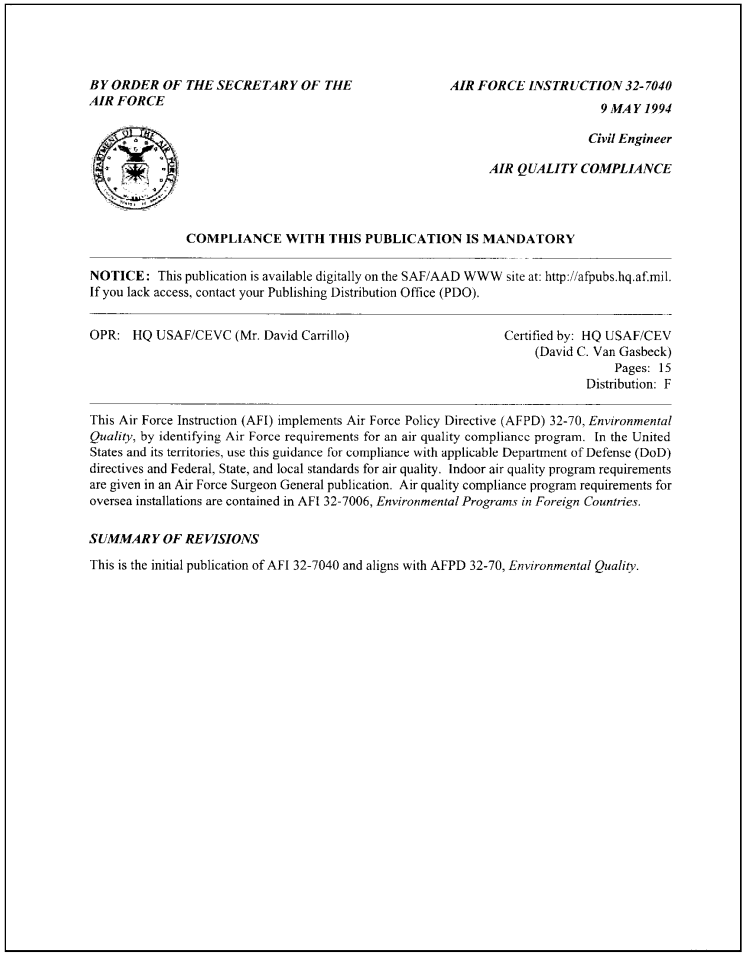
AFI Update/strategy

- **Background:**
  - **AFI 32-7040, *Air Quality Compliance,* 9 May 94**
  - **Inconsistent with current AFIs, SAF orders, and policies**
- **Action:**
  - **Review and update**
- **Current Status:**
  - **Review is underway**
  - **Action Officers, IMAs, and contractor support**



BY ORDER OF THE SECRETARY OF THE AIR FORCE

AIR FORCE INSTRUCTION 32-7040
9 MAY 1994
Civil Engineer
AIR QUALITY COMPLIANCE

COMPLIANCE WITH THIS PUBLICATION IS MANDATORY

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This Air Force Instruction (AFI) implements Air Force Policy Directive (AFPD) 32-70, *Environmental Quality*, by identifying Air Force requirements for an air quality compliance program. In the United States and its territories, use this guidance for compliance with applicable Department of Defense (DoD) directives and Federal, State, and local standards for air quality. Indoor air quality program requirements are given in an Air Force Surgeon General publication. Air quality compliance program requirements for oversea installations are contained in AFI 32-7006, *Environmental Programs in Foreign Countries.*

SUMMARY OF REVISIONS

This is the initial publication of AFI 32-7040 and aligns with AFPD 32-70, *Environmental Quality*.

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AFI Update/strategy

- Revise to incorporate CAA regulatory changes adopted since Jan 93
- Focus on program principles (vision, mission, and goals) and functional roles and responsibilities
- Discuss new rules/policies relating to:
  - New major/minor sources of emissions or modifications to existing sources
  - Permit programs
  - Hazardous Air Pollutants (HAP)
  - National Ambient Air Quality Standards (NAAQS) for Criteria Pollutants
  - Mobile sources (Title II Programs)
  - Ozone Depleting Substances (ODSs)
  - Emergency Planning and Community Right-to-Know Act

EQ Program Review

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EQ Program Review Schedule

Past:

- Nov 01: FY04-09 POM Environmental Quality (EQ) requirements
  - Pulled FY04 EQ requirements for library
- Mar/Apr 02: FY04-09 POM submission
  - Pull FY04 EQ requirements for library

Present:

- May 02: FY03 Fin Plan
  - Pull FY03 EQ requirements for library

Future:

- Nov 02: FY05 APOM EQ requirements
- Mar/Apr 03: FY05-09 APOM submission
- May 03: FY04 Fin Plan

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EQ Program Review Strategy

- **Balanced command POM submissions within assigned topline**
  - **Provides maximum flexibility to the MAJCOMs to optimum execution**
  - **Executable, balance risk across capabilities**
- **Command POM submissions funds all “must pay” bills**
  - **"Must pays" are those obligations for which the command has no discretion to cancel or modify**

    (Level 0 and Level 1 EQ projects)
  - **Due to the nature of EQ requirements and the potential risk to human health**

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EQ Program Review "The Process"

- **Qualitative review of the FY05-09 APOM submittal**
  - **Focus on only FY05**
  - **Ensures valid EQ requirements are programmed, consistent with policy, and necessary within programmed year**
  - **Ensures completeness of program**
    - **New laws/regulations addressed, core media requirements programmed, P2 pursued as first choice**
- **Qualitative feedback provided to each MAJCOM by media type**
  - **Notes overall trends (good and bad), apparent inconsistencies with policy, weaknesses in programming**
  - **Recommends how to improve the credibility and defensibility of the MAJCOM program**

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EQ Program Review
Watch out for

- Valid projects with inadequate, illogical, generic, or missing drivers and/or supporting narratives
- Narratives that are too general
- Permit details that are generally absent
- None level 0 and 1 projects categorized as must pays
- Dual programming by MAJCOMS and installations
- Valid and invalid projects in single project
- Titles that do not match narratives, and vice versa
- Requested fund that are high for the described project
- Listing incorrect topic, statutory authority, or pollution category

ACES
Air Quality Program

ACES

- AF/CE began consolidating all management, tracking, and reporting systems into ACES in CY95
- Automated tool to manage, track, and report on all Air Force Civil Engineer functional areas
  - Real Property, Project Management, Housing, Fire Department, Personnel & Readiness, Operations, Environmental, Explosive Ordnance Disposal modules
    - ACES Real Property was the first module fielded in CY99
    - ACES Project Management first module fielded on the web in CY01
  - Focuses on installation data for fixed bases and deployed forces

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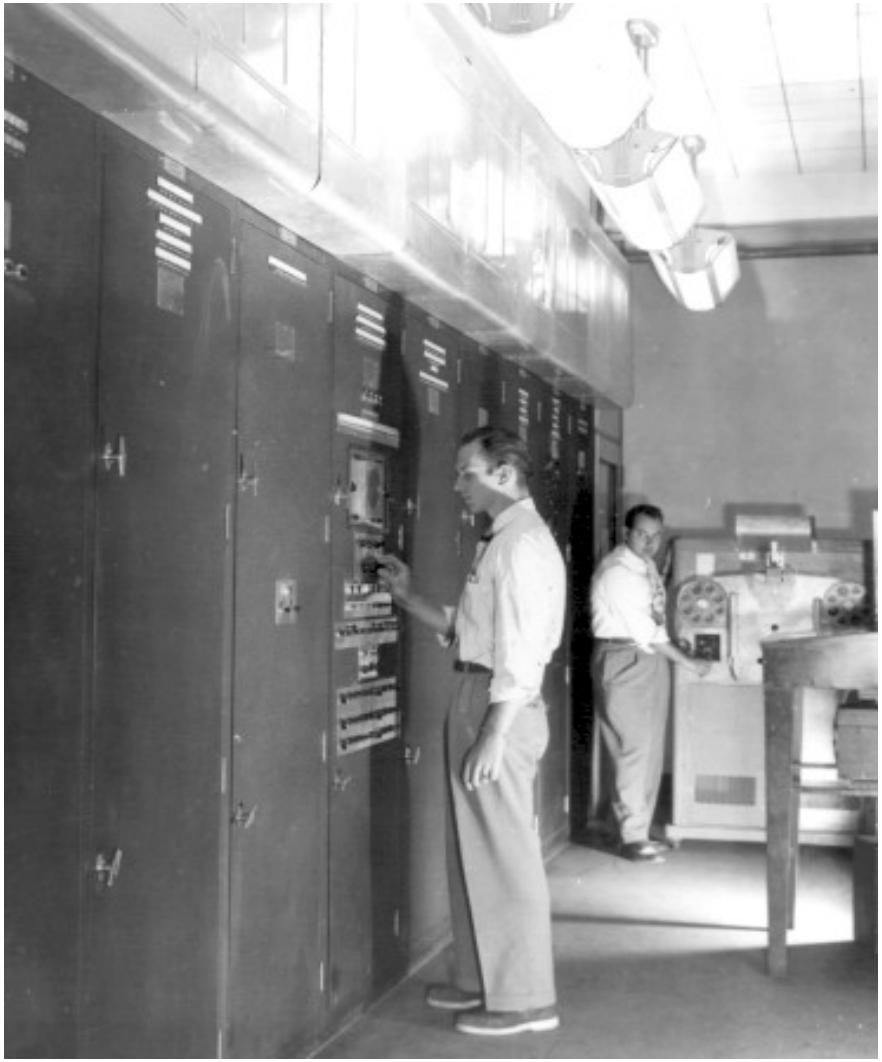
ACES Environmental Vision



- Integrate multiple system into one system
  - Improve and standardize business practices
  - Develop a new system rather than incremental adaptation and interfacing of legacy systems
- Collaborate with AFMOA to develop, deploy, and sustain a management information system with heavy emphasis on environmental data, i.e., APIMS
  - AFCESA/AFMOA MOA signed on 26 Apr 02

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ACES Environmental Legacy Systems

Functional Area	Systems
Hazardous Materials/EPCRA Reporting	HMMS/ AF-EMIS
Air Quality	APIMS
Hazardous Waste	AF-EMIS
Environmental Cleanup/Ranges	AFRIMS
Water Quality	
Incident Reporting	
Pest Management	IPMIS
ECAMP	
Compliance Assurance & Pollution Prevention	
Natural Resources	
Cultural Resources	
NEPA	
Tanks	
Solid Waste	
Toxics	
DUSD Reporting	DUSD System
Inspections/Enforcement Reporting	

- Chief Financial Officer (CFO) Act requirements
- Global Combat Support System
  - Eliminate redundant and erroneous data sets
  - Certificate/Accreditation
- Web-based system
- Geographic information
- Focus on deploying new HW, HM, Air, Water, EPCRA reporting, and environmental cleanup applications in FY03

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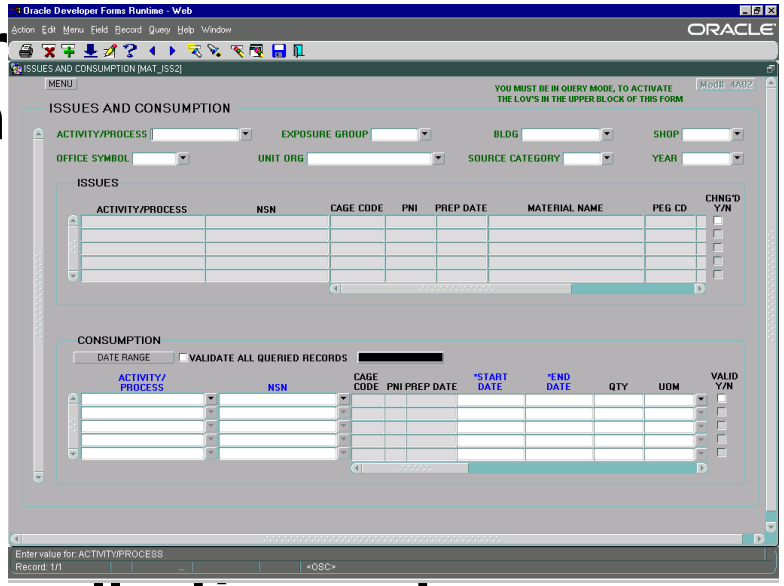
ACES Environmental APIMS

- Manages, tracks and repor
on the Air Quality program
  - Tracks and generates Air Emission Inventory data
  - Certifies compliance with permits, Title V, NESHAP
- Reuses data collected by other functions to:
  - Maximize the benefits of data collection cost
  - Eliminate redundant data entry
  - “What if” scenarios
- Basic and detailed programming document complete on 26 Apr 02
- http://www.eesoh.com/esohJsp/eesoh_portal/login.jsp



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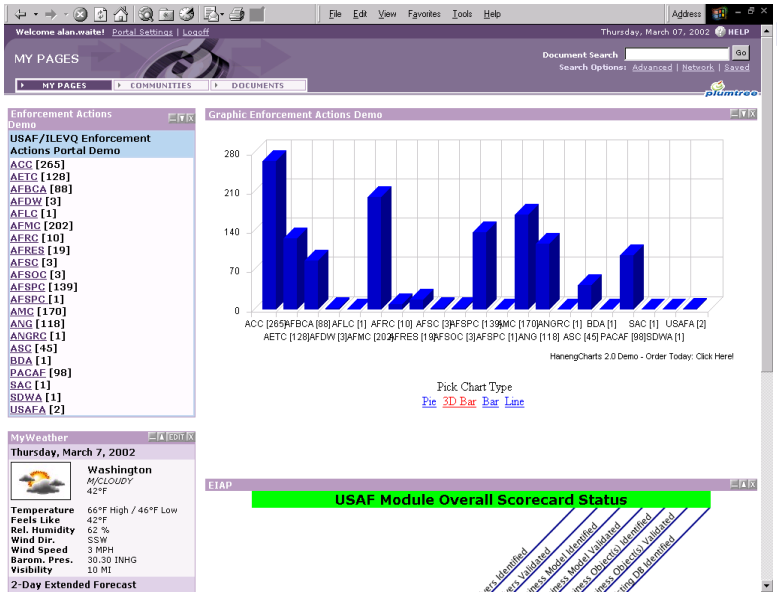
ACES Environmental Concept View



- **CSAF/SECAF Memo, 3 Jan 01**
  - **"…[move *all* "unclassified" applications to the Air Force portal by 1 Jul 01]…"**
- **Gateway or starting web site**
  - **Web-based front-end to corporate information**
  - **Benefits**
    - **Common interface and access point**
    - **Targeted content to specific users**

- **Operational need**
  - **Users access to the information required to accomplish their mission**
  - **Decision makers need the information now!**
  - **Provides a catalyst for eliminating duplicate systems**
- **Accessed through https:my.af.mil**
  - **Personalization within user role boundaries**

Military MACT

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Hazardous Air Pollutants
Military MACT

- EPA intends to announce a Military Surface Coating MACT Category
- Military MACT will regulate military surface coating operations not regulated by the Aerospace and Shipbuilding NESHAPs
  - Plastic Parts and Products (PPP)
    Miscellaneous Metal Parts and Products (MMPP)
  - Large Appliance
  - Other surface coating operations
- Would require promulgation within two years of announcement

Hazardous Air Pollutants
Military MACT

Proposed Rule Development Schedule

Action	Date
Announce Category	2-Nov-02
Draft Rule Proposal	3-Aug-03
Review and Signature	3-Nov-03
Publish Proposed Rule	3-Nov-03
Public Comment	4-Jan-04
Incorporate Comments	3-Aug-04
Review and Signature	4-Nov-04
Publish Final Rule	4-Nov-04
Compliance Date	7-Nov-04

MACT Hammer Permits

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Hazardous Air Pollutants
MACT Hammer

- EPA missed the deadline to complete all NESHAPs
  - Two part permit applications for affected facilities
  - Part 2 permit applications due by 15 May 04
- Suit filed by the Sierra Club to overturn the extension for submitting Part 2 permit applications
- Proposed settlement between EPA and the Sierra Club would move up the deadline to 15 May 03
  - Problematic for the Air Force as FY03 budgets do not include funds to prepare the Part 2 applications

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Hazardous Air Pollutants
MACT Hammer

- **EPA is attempting to negotiate a new agreement with the Sierra Club, state regulators, and industry**
  - **Different industrial air pollution source categories would face individual deadlines for submitting detailed applications**
  - **State would determine the HAP limits on a case-by-case basis if EPA does not first issue limits for the source category**
- **The lawsuit is not settled**
  - **Parties are discussing a series of deadlines beginning in May 03 for completing MACT standards**

Legislative Proposals

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Legislative Proposals
Particulate Matter - 2.5

- **Proposal to amend the FY03 National Defense Authorization Act**
  - **PM 2.5 rule will not apply to emissions resulting directly from military training exercises and maneuvers**
  - **Clarifies that an area will not be redesignated to nonattainment solely on the basis of emissions of PM 2.5 resulting from military training exercises and maneuvers**
- **DoD shall ensure that best management practices are used to minimize emissions of PM 2.5**
- **DoD shall ensure the public is provided with advance notice of military training exercises and military maneuvers that may cause violations of PM 2.5 air quality standards**

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Legislative Proposals CAA

- Clarifies that Federal agencies and officers may remove CAA suits to Federal District Court
- Complex federal issues to be decided by federal judges
  - Avoids Federal-State conflicts and local pressures
  - Reduces number of jurisdictions addressing key national issues
- Necessitated by a CY00 federal court decision that CAA provision giving states jurisdiction was not superceded by or inconsistent with later-enacted CY96 amendment to the Federal Removal Statute
  - McClellan AFB

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QUESTIONS?